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December 28, 2020

Judge Richard M. Berman Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

RE: United States v. Robert Hadden, 20 Cr. 468 (RMB)

Dear Judge Berman:

We are temporary counsel to Robert Hadden. We write following (1) this Court's Decision & Order dated December 23, 2020; (2) Clayman & Rosenberg LLP's Letter Motion dated December 24, 2020; and (3) this Court's December 26, 2020 Order rejecting Clayman & Rosenberg LLP's Letter Motion.

Pursuant to the December 26 Order, Clayman & Rosenberg LLP will be filing a motion that addresses its status as counsel to Mr. Hadden in this matter and Mr. Hadden's application for court-appointed counsel. We propose the following briefing schedule: our motion due Monday, January 4, 2021; Government response (if any) due Thursday, January 7, 2021; our reply (if any) due Saturday, January 9, 2021.

In light of the proposed briefing schedule set forth above, we also request that this Court stay that portion of its December 23 Decision & Order that requires Clayman & Rosenberg LLP to submit to the court redacted copies of Mr. Hadden's financial affidavit until the motion has been decided by this Court.

We have conferred with the government and they do not object to our requests.

Respectfully submitted,

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cc by ECF:

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